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To: [Chip_Humphrey/R10/USEPA/US@EPA](#)
Subject: Draft Plan Comments
Date: 08/01/2006 09:21 AM

Chip, here are comments on the draft plan. I am in all day today and available to discuss except for conference calls from 8:30 am to about 9:30 am, and 1:30 pm until about 2:30 pm.

1. P.2, first paragraph: delete second "117(a)" cite.
2. P.2, first bullet: rephrase suggested "...users of the Site, and compatibility of future uses of the Site and its associated groundwater with the..."
3. P.4, last sentence of first para: "...runs through the northern and..."
4. P.5, fourth para: move this paragraph between paragraphs starting "The Fairview Farms" and "The south wetlands" to be consistent with the order of areas presented in the third paragraph.
5. P.5, para starting "The East Area": In the second sentence, there are also large parking areas and a road in the northern part of this area. Revise second sentence to read "...small building that houses equipment needed for operation of..."
6. P.5, para starting "The Fairview": Regarding the second sentence, I thought that overflow from south wetlands and/or Sundial Creek potentially carried stormwater from the plant through Fairview Farms via the drainage ditch.
7. P.6, para starting "This Plan": The last sentence of the para indicates that the interim rod was a result of waiting until demolition of the plant. I don't recall that we knew that the plant would be demolished at that time.
8. P.7, last line: remove extra period. In table for Company Lake, change to read "...process residue and underlying sediment;..." The material below the process residue is more likely sediment (the lake was a natural feature), and is referred to as sediment later in the text. In addition, the material removed from south ditch is called sediment even though that feature has been enhanced and/or cleaned in the past through excavation. Should the term "waste" used in the table be debris? You have used the terms contaminated soil and debris, contaminated waste and soil, and process residue and somehow waste seems incongruous. Waste would seem most appropriate for the landfills.
9. P.8: The presentation of these areas is not in the same order as the table. Perhaps petty, but an unconscious reaction to look for things in order. In "North Landfill", last sentence, do you need to add total for carcinogenic PAHs? I assume the 36 mg/kg means for all the carcinogenic PAHs added together. This style of reference is in several other paragraphs in this section. In "Company Lake", revise sentence to read "...90,850 tons of the process residue and some underlying sediment was removed..." In the last sentence, add total carcinogenic before PAHs.
10. P. 9: In "South Landfill", fourth sentence, change leaching to migration. Add "Soil" to the beginning of the fifth sentence. Add total before carcinogenic PAHs.
11. P. 9: In Scrap Yard: Revise the fourth sentence to "...and metals contamination in groundwater in the intermediate sand and deep sand/gravel water-bearing zones between the..." You began the text defining the water-bearing zones and should continue to use that terminology for better understanding. In the last sentence add total carcinogenic before PAHs.
12. P.9, "Groundwater Evaluation": in the first sentence of the first para, add "water-bearing" before

zones. In the third para, fourth sentence, change groundwater layer to water-bearing zone, insert "the" before intermediate and change groundwater to water-bearing zone.

13. P.10, first bullet: Revise to "the previously described soil source removals". In the para that starts "The FE/PWO", third sentence change provide to provided and PWO3 should be PW03 (this one is a zero not an "O"). Delete comma after November in the fourth sentence.

14. P.10, "Post-Demolition", first para last sentence: add comma before metals, the "O" is SVOCs is a zero. First sentence in second para revise to "The assessment areas..."

15. P.11: Add a period to last sentence in first para. In "South Wetlands" Revise first sentence "... residue was conducted in 1999", second sentence "...railroad embankment was conducted...", third sentence "...not impacted the upper gray sand water-bearing zone."

16. P.11, "Summary": First para, last sentence use the acro Baseline RA. Second para, second sentence, should this be contaminated soil and debris? In the fourth sentence of the second para, what does "...this proposed plan or one of the other measures considered in the proposed plan..." mean? Wouldn't you be saying that either the preferred alternative, or remedial action is necessary?

17. P.12: Add Soil before Exposure in the table title. In the para "Groundwater extracted", add water-bearing before zone in the first sentence. In this para, use the acros Baseline RA and Post-Demolition RA that were previously defined.

18. P.13: In the second, third, fifth and sixth paras use the Baseline RA and Post-Demolition RA acros that were previously defined.

19. P.14: In the second para, fourth sentence, revise to "...operation of the groundwater production well optimization system to contain..."

20. P.15: In the first para is waste the best term? Add a sentence before the para starting "Based on the results", like "Soil and debris removals were conducted to meet the first and third objectives." In the para starting "The Interim ROD", revise the first sentence to "...operation of the FE/PWO system to meet..." since the terms were already defined. In the first para under "Summary of Cleanup", use the Post-Demolition acro previously defined.

21. P.16: Between end of first para and para starting "Institutional controls", insert the end of the third para from page 18, that starts "An evaluation of a "no pumping" scenario..." because it is not clear that there is no pumping in this alternative and this text seems out of place where it is currently on page 18. The second para starting "Institutional controls" indicates institutional controls will stay in place until cleanup levels are achieved which implies remediation. Should you add a statement about achieving cleanup levels through attenuation (as opposed to pumping)? In the second sentence of this para delete the parentheses around "the silt unit".

22. P. 16, "Alternative 3": Revise the first sentence "...production wells and concentrations of fluoride reduced through focused extraction..." In the fourth sentence change PWO8 to PW08 (the "O" should be a zero) and add "(gpm)" before "each to control". In the second sentence of the second para, replace "gallons per minute" with "gpm".

23. P.17: In the second bullet of the boxed text, requirement should be requirements

24. P.18: There isn't a discussion of whether Alternative 3 meets overall protection of human health and the environment. Move the last part of the third para to page 16 as it is more descriptive of Alternative 2. You might keep the last half of this passage and add a new beginning that would state the protectiveness of Alternative 3. In the fourth para, first sentence, add "soil" before contamination. In the third sentence, text states that restrictions on groundwater may need to continue for 20 years or longer, when on page 19 you say may last up to 20 years. These should be the same.

25. P.19: Para starting "Excavation" and para starting "Highly contaminated" consider whether contaminated waste and soil is the best term. You use more than one term with waste, soil and debris. In the second sentence be more specific and say "Removal of the process residue layer in Company Lake..."

26. P. 20: Under Short-term Effectiveness, Alternative 3 also would not prevent exposure to residual soil contamination in the East Plant area and South Wetlands. Last sentence under Implementability, should be "easement and equitable servitude". Under Cost, the text mentions the cost for monitoring I am not sure why you have called out the monitoring cost, whether this applies to both the preferred and Alternative 3, and how that distinguishes between them. Try to clarify what your meant. Under State Support, I agree with your suggestion to add a more general statement that just says that the remedy selection should have the support of the State or similar.

27. P.21: Second para use the Post-Demolition acro that was previously defined. Third para, last sentence, add "be" before established. Fourth para, last sentence change "uses and in a reasonable" to "uses within a resonable". Fifth para is a little awkward in meaning. I am interpreting the following (with some edits) "...restoration potential of the silt zone was based on estimated yields generally below 0.1 gpm, which limits its potential use as a drining water source, and the technical impracticability of active remediation options that were considered to reduce fluoride levels in a reasonable timeframe. The source removal in the contamianted areas..."

Hope this is not too late to be of use to you.

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